

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

3G LICENSING, S.A., KONINKLIJKE KPN )  
N.V., and ORANGE S.A., )  
Plaintiffs, ) C.A. No. 17-82-LPS-CJB  
v. ) JURY TRIAL DEMANDED  
BLACKBERRY LIMITED and BLACKBERRY )  
CORPORATION, )  
Defendants. )  
\_\_\_\_\_  
3G LICENSING, S.A., KONINKLIJKE KPN )  
N.V., and ORANGE S.A., )  
Plaintiffs, ) C.A. No. 17-84-LPS-CJB  
v. ) JURY TRIAL DEMANDED  
LENOVO GROUP LTD., LENOVO HOLDING )  
CO., INC., LENOVO (UNITED STATES) INC. )  
and MOTOROLA MOBILITY LLC, )  
Defendants. )  
\_\_\_\_\_  
3G LICENSING, S.A., KONINKLIJKE KPN )  
N.V., and ORANGE S.A., )  
Plaintiffs, ) C.A. No. 17-85-LPS-CJB  
v. ) JURY TRIAL DEMANDED  
LG ELECTRONICS INC., LG ELECTRONICS, )  
U.S.A., INC. and LG ELECTRONICS )  
MOBILECOMM U.S.A., INC., )  
Defendants. )

KONINKLIJKE KPN N.V., )  
Plaintiff, )  
v. ) C.A. No. 17-86-LPS-CJB  
GEMALTO IOT LLC, GEMALTO M2M GMBH, )  
and GEMALTO INC., )  
Defendants. )  
\_\_\_\_\_  
KONINKLIJKE KPN N.V., )  
Plaintiff, ) C.A. No. 17-87-LPS-CJB  
v. )  
KYOCERA CORPORATION and KYOCERA )  
INTERNATIONAL, INC., )  
Defendants. )  
\_\_\_\_\_  
KONINKLIJKE KPN N.V., )  
Plaintiff, ) C.A. No. 17-88-LPS-CJB  
v. )  
NEC CORPORATION and NEC CORPORATION )  
OF AMERICA, )  
Defendants. )  
\_\_\_\_\_  
KONINKLIJKE KPN N.V., )  
Plaintiff, ) C.A. No. 17-90-LPS-CJB  
v. )  
SIERRA WIRELESS, INC. and SIERRA )  
WIRELESS AMERICA, INC., )  
Defendants. )

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KONINKLIJKE KPN N.V.,	)
	)
Plaintiff,	)
	) C.A. No. 17-91-LPS-CJB
v.	)
	) <b>JURY TRIAL DEMANDED</b>
TCL COMMUNICATION, INC., TCL	)
COMMUNICATION TECHNOLOGY HOLDING	)
LIMITED, TCT MOBILE, INC., TCT MOBILE	)
(US) INC., and TCT MOBILE (US) HOLDINGS,	)
INC.,	)
	)
Defendants.	)
	)
KONINKLIJKE KPN N.V.,	)
	)
Plaintiff,	)
	) C.A. No. 17-92-LPS-CJB
v.	)
	) <b>JURY TRIAL DEMANDED</b>
TELIT WIRELESS SOLUTIONS, INC.,	)
	)
Defendant.	)

**DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS  
THAT U.S. PATENT NO. 6,212,662 IS INVALID UNDER 35 U.S.C. § 101**

Pursuant to Fed. R. Civ. P. 12(c), Defendants BlackBerry Limited, BlackBerry Corporation, Lenovo Holding Co., Inc., Lenovo (United States) Inc., Gemalto IOT LLC, Gemalto M2M GmbH, Gemalto Inc., Kyocera Corporation, Kyocera International, Inc., LG Electronics Inc., LG Electronics U.S.A., Inc., LG Electronics MobileComm U.S.A., Inc., NEC Corporation, NEC Corporation of America, Sierra Wireless, Inc., Sierra Wireless America, Inc., TCL Communication, Inc., TCL Communication Technology Holding Limited, TCT Mobile, Inc., TCT Mobile (US) Inc., TCT Mobile (US) Holdings, Inc., and Telit Wireless Solutions, Inc. (collectively “Defendants”) respectfully move for judgment on the pleadings that claims 1-4 of U.S. Patent No. 6,212,662 are invalid under 35 U.S.C. § 101 as patent-ineligible. The grounds for this motion are set forth in Defendants’ Opening Brief, submitted herewith.

OF COUNSEL:

Eric Kraeutler  
John V. Gorman  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Tel: (215) 963-5000

Robert C. Bertin  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue N.W.  
Washington, DC 2004-2541  
Tel: (202) 739-3000

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Amy M. Dudash  
Colm F. Connolly (#3151)  
Amy M. Dudash (#5741)  
The Nemours Building  
1007 North Orange Street, Suite 501  
Wilmington, DE 19801  
Tel: (302) 574-3000  
[colm.connolly@morganlewis.com](mailto:colm.connolly@morganlewis.com)  
[amy.dudash@morganlewis.com](mailto:amy.dudash@morganlewis.com)

*Attorneys for Defendants BlackBerry Limited  
and BlackBerry Corporation*

OF COUNSEL:

Jonathan E. Retsky  
Kathleen B. Barry  
James Winn  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
Tel: (312) 558-5600

Andrew R. Sommer  
WINSTON & STRAWN LLP  
1700 K Street, N.W.  
Washington, D.C. 20006-3817  
Tel: (202) 282-5000

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jack B. Blumenfeld  
Jack B. Blumenfeld (#1014)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
Tel: (302) 658-9200  
[jblumenfeld@mnat.com](mailto:jblumenfeld@mnat.com)

*Attorneys for Defendants Lenovo Holding Co.,  
Inc., and Lenovo (United States) Inc.*

OF COUNSEL:

Peter H. Kang  
Ashish Nagdev  
Jinyung Lee  
SIDLEY AUSTIN LLP  
1001 Page Mill Road, Building 1  
Palo Alto, CA 94304  
Tel: (650) 565-7000

Ryan M. Sandrock  
SIDLEY AUSTIN LLP  
555 California Street, Suite 2000  
San Francisco, California 94104  
Tel: (415) 772-1200

MORRIS NICHOLS ARSHT & TUNNELL

By: /s/ Rodger D. Smith  
Rodger D. Smith (#3778)  
1201 North Market Street, 16th Floor  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Tel: (302) 351-9205  
[rsmith@mnat.com](mailto:rsmith@mnat.com)

*Attorneys for Defendants LG Electronics Inc.,  
LG Electronics U.S.A., Inc., and LG  
Electronics MobileComm U.S.A., Inc.*

OF COUNSEL:

Brian A. Rosenthal  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
Tel: (212) 351-4000

Colby A. Davis  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Tel: (213) 229-7000

Brian K. Andrea  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Ave., N.W.  
Washington, DC 20036-5306  
Tel: (202) 955-8500

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Stephanie E. O'Byrne (#4446)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[sobyrne@potteranderson.com](mailto:sobyrne@potteranderson.com)

*Attorneys for Defendants Gemalto IOT LLC,  
Gemalto M2M GmbH, and Gemalto Inc.*

OF COUNSEL:

David L. Witcoff  
Marc S. Blackman  
Thomas W. Ritchie  
JONES DAY  
77 West Wacker  
Chicago, IL 60601-1692  
Tel: (312)782-3939

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Stephen J. Kraftschik  
Mary B. Graham (#2256)  
Stephen J. Kraftschik (#5623)  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Tel: (302) 658-9200  
[mgraham@mnat.com](mailto:mgraham@mnat.com)  
[skraftschik@mnat.com](mailto:skraftschik@mnat.com)

*Attorneys for Defendants Kyocera Corporation  
and Kyocera International, Inc.*

OF COUNSEL:

Stuart W. Yothers  
Kevin V. McCarthy  
JONES DAY  
250 Vesey Street  
New York, NY 10281-1047  
Tel: (212) 326-3939

Maxwell A. Fox  
JONES DAY  
Kamiyacho Prime Place  
1-17, Toranomon 4-Chome  
Minato-Ku, Tokyo 105-0001, Japan  
Tel: +81.3.6800.1876

ASHBY & GEDDES

By: /s/ Steven J. Balick  
Steven J. Balick (#2114)  
Andrew C. Mayo (#5207)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
Tel: (302) 654-1888  
[sbalick@ashby-geddes.com](mailto:sbalick@ashby-geddes.com)  
[amayo@ashby-geddes.com](mailto:amayo@ashby-geddes.com)

*Attorneys for Defendants NEC Corporation  
and NEC Corporation of America*

OF COUNSEL:

Adam Alper  
Eric Cheng  
KIRKLAND & ELLIS LLP  
555 California Street  
San Francisco, CA 94104  
Tel: (415) 439-1400

Michael W. De Vries  
Robert Taylor  
KIRKLAND & ELLIS LLP  
333 S. Hope Street  
Los Angeles, CA 90071  
Tel: (213) 680-8400

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jack B. Blumenfeld  
Jack B. Blumenfeld (#1014)  
Jeremy A. Tigan (#5239)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
Tel: (302) 658-9200  
[jblumenfeld@mnat.com](mailto:jblumenfeld@mnat.com)  
[jtigan@mnat.com](mailto:jtigan@mnat.com)

*Attorneys for Defendants Sierra Wireless, Inc.  
and Sierra Wireless America, Inc.*

OF COUNSEL:

William P. Quinn, Jr.  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Tel: (215) 963-5000

Bradford A. Cangro  
Hang Zheng  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave., NW  
Washington, D.C. 20004-2541  
Tel: (202) 739-3000

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jody C. Barillare  
Jody C. Barillare (#5107)  
The Nemours Building  
1007 N. Orange Street, Suite 501  
Wilmington, DE 19801  
Tel: (302) 547-3000  
[jody.barillare@morganlewis.com](mailto:jody.barillare@morganlewis.com)

*Attorneys for Defendants TCL Communication,  
Inc., TCL Communication Technology Holding  
Limited, TCT Mobile, Inc., TCT Mobile (US)  
Inc., and TCT Mobile (US) Holdings, Inc.*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

David A. Loewenstein  
Guy Yonay  
Clyde A. Shuman  
PEARL COHEN ZEDEK LATZER BARATZ LLP  
1500 Broadway, 12<sup>th</sup> Floor  
New York, NY 10036  
Tel: (646) 878-0800

By: /s/ Jack B. Blumenfeld  
Jack B. Blumenfeld (#1014)  
Rodger D. Smith (#3778)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
Tel: (302) 658-9200  
[jblumenfeld@mnat.com](mailto:jblumenfeld@mnat.com)  
[rsmith@mnat.com](mailto:rsmith@mnat.com)

*Attorneys for Defendant Telit Wireless  
Solutions, Inc.*

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